

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND**

JET CREATIONS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:24-cv-01340-JKB
	)	
Zhejiang Weilong Plastic Products Co.,	)	
Ltd., Beautiful Bubble Online Store,	)	JURY TRIAL DEMANDED
Dongyang Baozhi Toys Factory,	)	
Guangzhou Biedi Trading Co., Ltd, Jinhua	)	
Qixin Trading Co., Ltd., Junhua City	)	
Leyan Trading Co., Ltd., Qianshan County	)	
Hanying Trading Co., Ltd, Qianshan	)	
County Yingzhe Trading Co., Ltd.,	)	
Shanghai Yi Chen Industrial Co., Ltd.,	)	
Taiyuan Aoxuan Trading Co., Ltd, Taiyuan	)	
Qulite Information Technology Co., Ltd.,	)	
Taiyuan Xinyian Information Technology	)	
Co., Ltd., Wuling District Xinda Balloon	)	
Business Department (Ledou Balloon	)	
Xinda), Xunyang District Feier Department	)	
Store Business Department, and Yongkang	)	
Shikasuo Electronic Commerce Co., Ltd.,	)	
	)	
Defendants.	)	
	)	

**MOTION FOR DEFAULT JUDGEMENT  
AGAINST DEFENDANT DONGYANG BAOZHI TOYS FACTORY**

Comes now Plaintiff, Jet Creations, Inc. (“Plaintiff” or “Jet Creations”) by counsel, and here by requests the Court to enter judgement against the Defendant identified above in this cause of action and would show the Court as follows:

1. Plaintiff filed its Complaint against Defendant on 05/08/2024.
2. A summons was issued and the court docket reflects that the Defendant was duly served as shown in the attached Exhibit under the Hague Service Convention Protocol.
3. An answer from Defendant to the Complaint was due within the time required.
4. Defendant has defaulted by failing to tender an answer in this cause within the time required.
5. Defendant has defaulted, and Plaintiff is entitled to Judgement against Defendant in the amount consistent with the relief sought in the Complaint.

Plaintiff further requests 14-day extension for filing the Memorandum of Law in supporting claims of the damage, permanent injunction, and cost.

July 7, 2025

Respectfully Submitted,

Justin King, Esq.  
/s/ *Justin King*  
WPAT, PC  
8230 Boone Blvd., Suite 405  
Vienna, VA 22182  
(703) 639-0151  
[jking@wpat.com](mailto:jking@wpat.com)

*Attorneys for Jet Creations, Inc.*

# Exhibit

## 向国外送达司法文书或司法外文书的

## 请求书

REQUEST FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS  
DEMANDE AUX FINS DE SIGNIFICATION OU DE NOTIFICATION À L'ÉTRANGER  
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE

关于向国外送达民事或商事司法文书和司法外文书公约

一九六五年十一月十五日订于海牙

Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, signed at The Hague, the 15th of November 1965  
Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye le 15 novembre 1965.

<b>申请者身份及地址</b> Identity and address of the applicant identité et adresse du requérant  Wentao Huang 75th Floor, Shanghai Tower, 479 Lujiazui Ring Road, Pudong New Area, Shanghai 15000458839@139.com	<b>接收机关的地址</b> Address of receiving authority Adresse de l'autorité destinataire  • International Legal Cooperation Center(ILCC) Ministry of Justice No.33, PingAnLi West Ave., Beijing 100035, China • Tel: +86 10 5560 4537 • Fax: +86 10 5560 4538 • Email: inquiry@ilcc.online
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签署本请求书的申请者荣幸地转去下面开列的文书一式两份，并依上述公约第五条规定请求迅速将其中一份送达给收件人，即：

The undersigned applicant has the honour to transmit - in duplicate - the documents listed below and, in conformity with Article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.:  
Le requérant soussigné a l'honneur de faire parvenir - en double exemplaire - à l'autorité destinataire les documents ci-dessous énumérés, en la priant, conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, à savoir :

<b>(身份和地址)</b> (identity and address) / (identité et adresse)  Dongyang Baozhi Toys Factory [戴宏根 DALHONGGEN] Zhejiang Sheng, Jinhua Shi, 浙江省金华市东阳市画水镇联丰村上坞工业区 (东阳合威科技发展有限公司1幢1单元一楼) (自主申报) 13757939100 First Floor, Unit 1, Building 1, Lianfeng Village, Shangwu Industrial Zone, Huashui Town, Dongyang City, Jinhua City, Zhejiang Province, China	
<input checked="" type="checkbox"/>	<b>a) 请依公约第五条第一款第(一)项的规定进行送达。</b> in accordance with the provisions of sub-paragraph a) of the first paragraph of Article 5 of the Convention selon les formes légales (article 5, alinéa premier, lettre a)
<input type="checkbox"/>	<b>b) 请依下述特定方法送达 (第五条第一款第(二)项) :</b> in accordance with the following particular method (sub-paragraph b) of the first paragraph of Article 5): selon la forme particulière suivante (article 5, alinéa premier, lettre b)
<input type="checkbox"/>	<b>c) 如收件人自愿接受, 请予以交付 (第五条第二款)</b> by delivery to the addressee, if he accepts it voluntarily (second paragraph of Article 5) le cas échéant, par remise simple (article 5, alinéa 2)

请贵机关将该文书 (及其附件\*) 的副本连同所附的证明书退还或使之退还给申请者。

The authority is requested to return or to have returned to the applicant a copy of the documents - and of the annexes\* - with the attached certificate  
Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte - et de ses annexes\* - avec l'attestation ci-jointe.

文件清单:

List of documents / Énumération des pièces

Sequence	File Name
No.1	诉状
No.2	证据
No.3	传票

\* 适当时

if appropriate / s'il y a lieu

<b>制于 (地点)</b> 中国上海 Done at / Fait à  <b>(日期)</b> the / le 2024. 9.17	<b>签名和 (或) 盖章</b> Signature and/or stamp / Signature et / ou cachet  
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证明书  
CERTIFICATE  
ATTESTATION

根据公约第六条，签署本证明书的机关荣幸地证明  
The undersigned authority has the honour to certify, in conformity with Article 6 of the Convention,  
L'autorité soussignée a l'honneur d'attester conformément à l'article 6 de ladite Convention,

2261CNS20240917

☒ 1. 文书已予送达\*  
that the document has been served \*  
que la demande a été exécutée\*

- 日期: the (date) / le (date) :	30.Oct,2024
- 地点 (城镇、街、号) : at (place, street, number) / à (localité, rue, numéro) :	First Floor, Unit 1, Building 1, Lianfeng Village, Shangwu Industrial Zone, Huashui Town, Dongyang City, Jinhua City, Zhejiang

- 采用的第五条所规定的送达方法为: in one of the following methods authorised by Article 5: dans une des formes suivantes prévues à l'article 5 :	
<input checked="" type="checkbox"/>	a) 依公约第五条第一款第 (一) 项的规定。* in accordance with the provisions of sub-paragraph a) of the first paragraph of Article 5 of the Convention* selon les formes légales (article 5, alinéa premier, lettre a)*
<input type="checkbox"/>	b) 依下述特定方法* in accordance with the following particular method*: selon la forme particulière suivante*
<input type="checkbox"/>	c) 交付给自愿接受的收件人。* by delivery to the addressee, if he accepts it voluntarily* par remise simple*

请求书中所列文书已交付给:  
The documents referred to in the request have been delivered to:  
Les documents mentionnés dans la demande ont été remis à :

收件人身份和说明: Identity and description of person: Identité et qualité de la personne :	With a seal of the company
与受送达人的关系 (家庭、业务及其他) : Relationship to the addressee (family, business or other): Liens de parenté, de subordination ou autres, avec le destinataire de l'acte :	

☐ 2. 由于下列事实文书未能送达: \*  
that the document has not been served, by reason of the following facts\*:  
que la demande n'a pas été exécutée, en raison des faits suivants\*

--

☐ 按照公约第十二条第二款，请申请者支付或补偿后附说明中开列的费用。  
In conformity with the second paragraph of Article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement\*.  
Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint\*.

附:  
Annexes / Annexes

退还的文书: Documents returned: Pièces renvoyées :	
适当时，确认送达的文书: In appropriate cases, documents establishing the service: Le cas échéant, les documents justificatifs de l'exécution :	

\*适当时  
if appropriate / s'il y a lieu

制于 (地点) Done at / Fait à 北京 Beijing 日期 the / le 2024.11.08	签名和 (或) 盖章 Signature and/or stamp / Signature et / ou cachet <div>中华人民共和国 司法部 民商事司法协助专用章</div>
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海牙会议 常设局 2013 年 4 月

被送达文书概要

SUMMARY OF THE DOCUMENT TO BE SERVED  
ELEMENTS ESSENTIELS DE L'ACTE

关于向国外送达民事或商事司法文书和司法外文书公约

一九六五年十一月十五日订于海牙 (第五条第四款)

Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters, signed at The Hague, the 15th of November 1965  
(Article 5, fourth paragraph).  
Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires  
en matière civile ou commerciale, signée à La Haye le 15 novembre 1965 (article 5, alinéa 4).

请求机关的名称和地址: Name and address of the requesting authority: Nom et adresse de l'autorité requérante :	UNITED STATES DISTRICT COURT for the District of Maryland Andrew C. Aitken 6701 Democracy Blvd., Suite 555 Bethesda, Maryland 20817 acaitken@aitkenlawoffices.com (301) 537-3299
当事人详情: Particulars of the parties*: Identité des parties* :	Chinese name or name of the Plaintiff: Foreign name or name of the Plaintiff: Jet Creations Inc. Whether the plaintiff is the person served: No Chinese name or name of the Defendant: 东阳市宝智玩具厂 Foreign name or name of the Defendant: Dongyang Baozhi Toys Factory Whether the defendant is the person served: Yes Other information: 13757939100

\* 适当时, 应填写与递送文书有利害关系的人的身份和地址  
if appropriate, identity and address of the person interested in the transmission of the document  
s'il y a lieu, identité et adresse de la personne intéressée à la transmission de l'acte

☒ 司法文书\*\*  
JUDICIAL DOCUMENT\*\*  
ACTE JUDICIAIRE\*\*

文书的性质和目的: Nature and purpose of the document: Nature et objet de l'acte :	向被告提起民事诉讼, 送达民事起诉状、证据、传票等资料
诉讼的性质和目的, 适当时, 争议金额: Nature and purpose of the proceedings and, when appropriate, the amount in dispute: Nature et objet de l'instance, le cas échéant, le montant du litige:	案由: 著作权纠纷 要求被告停止侵权行为并支付赔偿最高17万美元费用 以及原告的实际损失
出庭的日期和地点:** Date and Place for entering appearance**: Date et lieu de la comparution** :	传票送达之日后20日内 至马里兰区地方法院应诉
作出判决的法院:** Court which has given judgment**: Jurisdiction qui a rendu la décision** :	美国马里兰区地方法院
判决日期:** Date of judgment**: Date de la décision** :	未明确
文书中所指明的期限:** Time limits stated in the document**: Indication des délais figurant dans l'acte** :	传票送达之日后20日内 至马里兰区地方法院应诉

\*\* 适当时  
if appropriate / s'il y a lieu

☐ 司法外文书\*\*  
EXTRAJUDICIAL DOCUMENT\*\*  
ACTE EXTRAJUDICIAIRE\*\*

文书的性质和目的: Nature and purpose of the document : Nature et objet de l'acte :	
文书中所指明的期限:** Time-limits stated in the document**: Indication des délais figurant dans l'acte**:	

\*\* 适当时  
if appropriate / s'il y a lieu



浙江省东阳市人民法院

送达回证

(2024)最高法协外送 23X63  
(2024)浙东协外送 311号

案由	知识产权权属、侵权纠纷	案号	(2024)浙0783民协外送7号
送达文书名称和件数	1.起诉状; 2.证据; 3.传票. 以上材料原件及复印件及翻译件各份.		
受送达人	东阳市宝智玩具厂		
送达地址	东阳市画水镇联丰村上坞社区(东阳市威利科技发展有限公司内幢1单元一楼)		
受送达人签名或盖章	年 月 日		
代收人与受送达人的身份关系	钱小英 2024年10月30日		
填发人	吕海平 卢益忠	填发日期	2024年10月30日
备注	钱小英系该个体工商户经营者戴宏根配偶.		

本回证收签后, 及时退回本院。



**CERTIFICATE OF SERVICE**

I hereby certify that copy of the Plaintiff's Motion for Default Judgement was sent via USPS Priority Mail Express along with tracking number RE130450672US to the Defendant Dongyang Baozhi Toys Factory at Address: First Floor, Unit 1, Building 1, Lianfeng Village, Shangwu Industrial Zone, Huashui Town, Dongyang City, Jinhua City, Zhejiang Province (Dongyang Hwei Technology Development Co., Ltd.), China on July 7, 2025.

July 7, 2025

/s/ Justin King  
Justin King, Esq. (# 31390)  
WPAT, PC.  
8230 Boone Blvd., Suite 405  
Vienna, VA 22182  
[jking@wpat.com](mailto:jking@wpat.com)